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ROBERT S. MARQUIS

June 20, 1991

Via Federal Express

The Honorable Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

ATTN: CHIEF, ALLOCATIONS BRANCH

Re: FM Channel Allotment Petition for Rulemaking
Loudon, Tennessee and Farragut, Tennessee (Channel 287A)

Dear Ms. Searcy:

Enclosed please find an original and four (4) copies of a "Petition for Rulemaking," filed herewith on behalf of our client, Deborah H. Greenwood, permittee of WXST(FM), Loudon, Tennessee. As noted therein, the petition seeks reallotment of FM Channel 287A from Loudon, Tennessee to the community of Farragut, Tennessee.

Also enclosed is an additional copy of the petition which we would appreciate your returning to the undersigned in the enclosed postage paid, self-addressed envelope after it has been date stamped by your office. Thank you for your assistance in this matter.

Sincerely,

Robert S. Stone
Counsel to Deborah H. Greenwood

RSS/rk
Enclosures

cc: Ms. Deborah H. Greenwood (w/enclosures)

DLB043/620green.fcc

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. _____
Table of Allotments,	)	RM - _____
FM Broadcast Station	)	
(Loudon, Tennessee and Farragut, Tennessee)	)	

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Deborah H. Greenwood ("Greenwood" or "Petitioner"), by her attorneys, and pursuant to §1.420(i) of the Commission's Rules and Regulations, hereby respectfully submits her Petition for Rulemaking, which seeks an amendment to the Commission's Table of FM Allotments, found in §73.202(b) of the Commission's Rules, so as to reallot FM Channel 287A from the community of Loudon, Tennessee to the community of Farragut, Tennessee as follows:

City	Channel No. Present	Channel No. Proposed
Loudon, Tennessee	256A, 287A	256A
Farragut, Tennessee	-----	287A

Greenwood also requests the modification of her construction permit, or license in the event her pending application for license to cover construction permit is granted in the interim, consistent with the above reallotment proposal.

In support whereof, the following is shown:

1. Petitioner is the permittee of WXST(FM), Loudon, Tennessee, operating on FM Channel 287A.[1] In addition to WXST, Loudon is the community of license for WLOD(AM) and WLOD-FM. WLOD(AM) operates on a frequency of 1140 kHz with a daytime only power of 1000 watts. WLOD-FM operates on FM Channel 256A with an effective radiated power of 3.0 kilowatts from an antenna height above average terrain of 91 meters.[2] The community of Farragut, Tennessee, on the other hand, is the community of license of only one radio station, WTNN(AM), which operates on a frequency of 670 kHz with a daytime only power of 500 watts. Petitioner's proposal would thus provide the community of Farragut with its first FM and first local night time transmission service without depriving the community of Loudon, Tennessee of either form of radio service.

2. The instant Petition for Rulemaking submitted by Greenwood clearly advances the goals of §307(b) of the Communications Act of 1934, as amended. Moreover, Greenwood's request for reallotment of FM Channel 287A to the community of Farragut, Tennessee would be fully consistent with the Commission's spacing and coverage requirements. Indeed, as confirmed by the attached engineering statement of Greenwood's consulting engineer, Greenwood presently

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[1]On May 30, 1991, Greenwood filed her application for license to cover construction permit for WXST(FM). Also on that date, an application for consent to assignment of construction permit for WXST(FM) was filed, seeking to assign the construction permit from Greenwood to Tellico Sound Limited, L.P. on FCC Form 316.

[2]On April 24, 1991, WLOD-FM filed an application for construction permit to increase effective radiated power to 6.0 kilowatts (BPH-910424IG).

renders a city grade signal over the entire community of Farragut, Tennessee from her existing transmitter site. In that regard, no change in transmitter site is contemplated by Greenwood in order to effectuate the proposed reallotment of Channel 287A from Loudon to Farragut. Consequently, no loss of reception service to any area would result from favorable action on the instant Petition for Rulemaking. Finally, it should be noted that the reallotment proposed herein would be mutually exclusive with Greenwood's existing operation as a Loudon, Tennessee radio station. See, Modification of FM and TV Authorizations (New Community of License), 4 FCC Rcd 4870, 66 RR2d 877 (1989), reconsideration granted in part and denied in part, 5 FCC Rcd 7094, 68 RR2d 644 (1990).

3. The community of Farragut, Tennessee is located in Knox County, Tennessee immediately adjacent to Loudon County, Tennessee. The community was incorporated in 1980, and has since surpassed all of Knox County in housing starts. Between 1980 and 1990, Farragut's population doubled, and is projected to triple by the year 2000. Its 1990 estimated population stood at 12,000 persons. It is served by a mayor and four (4) member Board of Aldermen and city manager. Over 100 members belong to the Farragut Chamber of Commerce. A full range of business, recreational, educational, religious, and charitable organizations serve the community. The population of Loudon, Tennessee, meanwhile, is only 4,430, according to the 1988 census estimates. Clearly, a first local night time transmission service allotted to the community would substantially further the public interest, convenience, and necessity, consistent with §307(b) of the Communications Act of 1934, as amended.

4. Should the Commission reallot FM Channel 287A to the community of Farragut, Tennessee as requested by Petitioner, Petitioner would promptly seek to modify her construction permit/license so as to specify the community of Farragut as the community of

license for WXST(FM). Consistent with her obligations as a broadcast permittee/licensee, Greenwood further states her commitment to provide continuing broadcast service to the community of Farragut and surrounding areas.

WHEREFORE, premises considered, Deborah H. Greenwood, permittee of WXST(FM), hereby respectfully urges the Chief, Allocations Branch to adopt a Report and Order providing for the reallotment of FM Channel 287A from the community of Loudon, Tennessee to the community of Farragut, Tennessee, and the simultaneous modification of her construction permit/license accordingly.

Respectfully submitted,

DEBORAH H. GREENWOOD

McCampbell & Young, Her Attorneys

By: Robert S. Stone

Robert S. Stone

McCampbell & Young, P.C.
2021 Plaza Tower
P. O. Box 550
Knoxville, TN 37901-0550
(615)637-1440

June 20, 1991

DLB042/614Green.pet/195001

CHANGE OF COMMUNITY OF LICENSE

Deborah H. Greenwood, Permittee of WXST(FM)
BMPH-901214IA
to
Farragut, Tennessee

Using the existing FM antenna site, height and effective radiated power authorized by BMPH-901214IA, the city-grade contour has been plotted on the USGS Chattanooga 1:250,000 scale map, attached as Exhibit I. This contour was calculated using average terrain elevations generated from the NGDC 30-second point elevation file for every 10 degrees of azimuth in conjunction with the F(50,50) propagation curves. See Exhibit II.

The community of Farragut, Tennessee, outlined in red on the original map copy, is completely encompassed by the city-grade contour. In addition, the 50 degree radial drawn through Farragut, Tennessee is shown as the green line through the community.

WXST(FM) PARAMETERS

Channel 287A
ERP: 6,000 watts
Antenna: R-C 370m AMSL, 100m HAAT
N LAT 35-48-40
W LNG 84-16-02

D.R. Magnuson

Dwight R. Magnuson, P.E.
Consultant to WXST(FM)

Dated: June 18, 1991

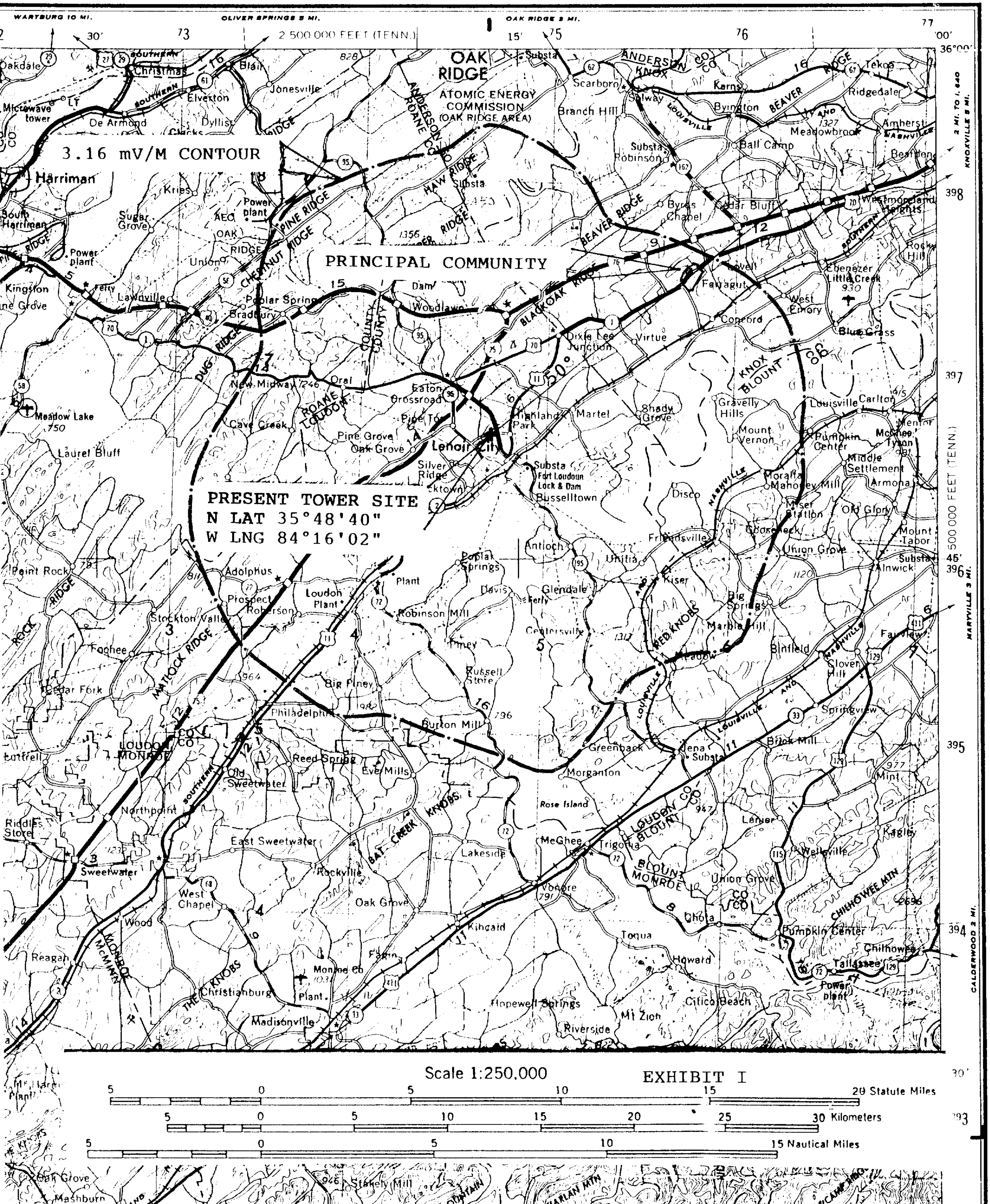
3.16 mV/M CONTOUR
PRINCIPAL COMMUNITY
PRESENT TOWER SITE
N LAT 35°48'40"
W LNG 84°16'02"
OAK RIDGE
ATOMIC ENERGY COMMISSION (OAK RIDGE AREA)
Harriman
Kingston
Lenoir City
Loudon
Farragut
Sweetwater
Madisonville
Scale 1:250,000
20 Statute Miles
30 Kilometers
15 Nautical Miles

EXHIBIT I

EXHIBIT II

DISTANCES TO CONTOURS (Kilometers):

Frequency: 105.3000 MHz

F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 70.0	
.0	106	7.78	16.6	
10.0	95	7.78	15.8	
20.0	83	7.78	14.7	
30.0	65	7.78	13.1	
40.0	74	7.78	14.0	
50.0	86	7.78	15.0	**Radial over Farragut, TN**
60.0	102	7.78	16.3	
70.0	110	7.78	17.0	
80.0	111	7.78	17.0	
90.0	105	7.78	16.6	
100.0	109	7.78	16.9	
110.0	99	7.78	16.1	
120.0	102	7.78	16.3	
130.0	114	7.78	17.3	
140.0	92	7.78	15.5	
150.0	85	7.78	15.0	
160.0	105	7.78	16.6	
170.0	126	7.78	18.3	
180.0	110	7.78	17.0	
190.0	102	7.78	16.3	
200.0	99	7.78	16.0	
210.0	112	7.78	17.2	
220.0	113	7.78	17.2	
230.0	117	7.78	17.5	
240.0	112	7.78	17.2	
250.0	110	7.78	17.0	
260.0	102	7.78	16.3	
270.0	86	7.78	15.0	
280.0	71	7.78	13.7	
290.0	65	7.78	13.1	
300.0	79	7.78	14.4	
310.0	92	7.78	15.6	
320.0	102	7.78	16.3	
330.0	95	7.78	15.8	
340.0	93	7.78	15.6	
350.0	91	7.78	15.4	